

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Kaiser Aluminum Fabricated Products, LLC
600 Kaiser Drive
Heath, OH 43056**

ATTENTION:

**Anthony Klapac
Environmental Health and Safety Manager**

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Kaiser Aluminum Fabricated Products, LLC (Kaiser or you) to submit certain information about the facility at 600 Kaiser Drive, Heath, Ohio. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendices B, C, and D specify the information that you must submit. You must send this information to us according to the schedules contained in each appendix.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Kaiser owns and operates an emission source at the Heath, Ohio facility. We are requesting this information to determine whether your emission source is complying with the Ohio State Implementation Plan and applicable CAA regulations.

Kaiser must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Kaiser must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix E, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix E provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.


We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Kaiser to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Sara Loiacono at 312-353-9199 or loiacono.sara@epa.gov.

Date

6/14/16



Edward Nam
Acting Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendices B, C, and D, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should

allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.* or the National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production at 40 C.F.R. Part 63, Subpart RRR.

Appendix B

Information You Are Required to Submit to EPA

Kaiser must respond to this information request pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) by performing testing at its facility at 600 Kaiser Drive, Heath, Ohio (the facility). Kaiser must submit an emission test plan, conduct emission testing, and submit all other information requested in accordance with the schedule specified below:

Submit Testing Protocol	Within 30 days of receipt of this request
Notification of Intent to Test	Not less than 21 days before testing
Complete Testing	Within 30 days of protocol approval by EPA
Submit Testing Report	Within 30 days of completion of testing

1. Within 90 days of the receipt of this request, Kaiser must perform the following emission testing:
 - a. At remelt furnace No. 3 (emissions unit P005), quantify the mass emission rate of filterable particulate matter and metals by performing outlet testing using EPA Reference Methods 1-5 and 29 (excluding analysis for mercury). Testing must be conducted at the melting furnace, holding furnace, and in-line fluxer.
 - b. At the four remelt furnaces (emissions units P005, P006, P007, and P020), quantify the mass emission rate of filterable particulate matter, hydrogen chloride (HCl) and hydrogen fluoride (HF) by performing outlet testing using EPA Reference Methods 1-5 and 26A. For each emissions unit, testing must be conducted at the melting furnace, holding furnace, and in-line fluxer.
2. Testing conducted pursuant to Item 1 must conform to the requirements and procedures as specified in 40 C.F.R. §63.1512(e)(4) and must be performed using procedures to minimize unmeasured emissions as specified in 40 C.F.R. §63.1512(e)(7).
3. During the testing conducted pursuant to Item 1, Kaiser shall monitor and record the operating parameters of each relevant process unit.
4. During the testing conducted pursuant to Item 1.a., Kaiser shall operate the facility at maximum production rates (greater than 95% capacity) and under representative conditions, while producing the highest lead content alloy made by the facility.
5. During the testing conducted pursuant to Item 1.b., Kaiser shall operate the facility at maximum production rates (greater than 95% capacity) and under representative conditions, while utilizing as reactive flux the highest chlorine- and fluorine-containing fluxes employed at the facility. Each flux must be added at the maximum

rate and in the maximum amount utilized by the facility.

6. Within 30 days of the receipt of this request, Kaiser shall submit to EPA and Ohio EPA the proposed testing protocol that completely describes the methods and procedures for testing at each unit, including all relevant operating parameters. The protocol shall state the proposed level of production during emission testing, as well as maximum and average production rates at processes associated with each emission point; shall state what procedures will be utilized to minimize unmeasured emissions; and, shall fully address the requirements of Items 1 - 5 of this information request. Kaiser shall conduct the testing under a protocol approved in advance by EPA. Kaiser shall submit the protocol via email to Sara Loiacono at loiacono.sara@epa.gov and to OEPA through eBusiness Center: Air Services at ebiz.epa.ohio.gov. EPA will provide approval or comments on the testing protocol via e-mail.
7. At least 21 days prior to the planned test(s), Kaiser shall submit notification to EPA and Ohio EPA of its intent to perform emission testing. Kaiser shall submit this notice via email to Sara Loiacono at loiacono.sara@epa.gov and to OEPA through eBusiness Center: Air Services at ebiz.epa.ohio.gov.
8. Within 30 days after completion of the test(s), Kaiser shall submit a complete report of the emissions testing, including, at minimum, the following:
 - a. Summary of Results
 - i. Results of the above-specified emission test(s);
 - ii. Process and control equipment data related to determining compliance;
 - iii. Discussion of any errors that occurred during testing;
 - iv. Discussion of any deviations from the reference test methods or other problems encountered during the test;
 - v. Lead content of metal(s) charged to furnaces during the testing; and
 - vi. Data on the production rate during testing (weight of alloy produced; weight of each charge and flux material used; the chloride and fluoride content of each flux used; and the composition of each charge material used).
 - b. Facility Operations
 - i. Description of the process and control equipment in operation during the test(s);
 - ii. Operating parameters of any control equipment in operation during the test(s);
 - iii. Facility operating parameters and data, including an explanation of how the operating parameters demonstrate that the process units were operated at maximum production rates at the time of the test.
 - c. Sampling and Analytical Procedures
 - i. Sampling port location(s) and dimensions of cross-section;

- ii. Sampling point description, including labeling system;
 - iii. Brief description of sampling procedures, including equipment and diagram;
 - iv. Description of sampling procedures (planned or accidental) that deviated from any standard method;
 - v. Brief description of analytical procedures, including calibration;
 - vi. Description of analytical procedures (planned or accidental) that deviated from any standard method; and
 - vii. Quality control/quality assurance procedures, tests, and results.
- d. Appendix
- i. Complete results with example calculations;
 - ii. Raw field data (original, not computer printouts);
 - iii. Laboratory report, with signed chain-of-custody forms;
 - iv. Calibration procedures and results;
 - v. Raw process and equipment data, signed by a plant representative;
 - vi. Test log(s); and
 - vii. Project participants and titles.

Appendix C

Information You Are Required to Submit to EPA

Kaiser must respond to this information request pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) by siting, installing, operating, and maintaining a total suspended particle (TSP) ambient air monitoring station at its facility and by submitting all other information requested in accordance with the schedule specified below.

Submit Proposed Monitoring Protocol	Within 21 days of receipt of this request
Submit Proposed Monitor Location	Within 21 days of protocol approval
Submit QAPP	Within 14 days of approval of monitoring site
Install and Operate Monitor	Within 14 days of approval of the QAPP
Begin Collection and Analysis of TSP Filters	Within 14 days after initial operation of the TSP ambient air monitor

1. Kaiser shall submit a proposed location for the ambient air monitor. The siting shall be determined by dispersion modeling showing the location of highest predicted lead ambient air (i.e., offsite, publically accessible) concentrations, taking into account monitor logistics. The modeling shall be conducted using AERMOD and shall incorporate stack and fugitive emissions. Modeling shall conform with EPA's Guideline on Air Quality Models contained in 40 C.F.R. Part 51, Appendix W. Within 21 days of receipt of this request, Kaiser shall submit a proposed modeling protocol, describing in detail the planned modeling methodology, to EPA for approval and/or comment. Upon protocol approval by EPA, within 21 days Kaiser must perform modeling according to the approved protocol and submit final modeling files for review, including all model input and output files, meteorological data files, a receptor map showing predicted lead concentrations, and a narrative to describe methodology and assumptions. EPA will provide approval or comments on the final modeling and proposed monitor location via e-mail. All model-related protocol and file submissions should be sent via email to Sara Loiacono at loiacono.sara@epa.gov.
2. Within 14 days of EPA's approval of the monitoring site, Kaiser must submit a Quality Assurance Project Plan (QAPP) via email to Sara Loiacono at loiacono.sara@epa.gov. The guidance document for writing a QAPP is titled "Guidance for Quality Assurance Project Plans," EPA QA/G-5, EPA/240/R-02/009, December 2002 (available at <https://www.epa.gov/sites/production/files/2015-06/documents/g5-final.pdf>). EPA will provide approval or comments on the QAPP via email.
3. Within 14 days of approval of the QAPP, Kaiser shall install and begin operation of a TSP filter-based monitor that meets the requirements of 40 C.F.R. Part 50, Appendix B – Reference Method for the Determination of Suspended Particulate Matter in the Atmosphere (High-Volume Method). The TSP filter-based monitor shall be operated every third day for sample collection.

4. Within 14 days after initial operation of the TSP ambient air monitor and continuing for no less than 12 full calendar months until a minimum of 120 valid samples have been collected, Kaiser shall collect and analyze the TSP filters according to EPA's 3-Day Monitoring Schedule posted at <https://www3.epa.gov/ttn/amtic/calendar.html>. If the initial monitoring date occurs on any day other than the first day of a month, then the monitoring period extends through the end of that month plus the next 12 months.
5. TSP filters must be analyzed using the Federal Reference Method (FRM) for the Determination of Lead in Total Suspended Particulate Matter, described at 40 C.F.R. Part 50, Appendix G.
6. Kaiser must obtain and record wind speed and wind direction data at 1-hour intervals from the nearest meteorological station for the duration of the ambient air monitoring period. The meteorological station used must be the same station from which data was used to conduct the modeling described in Item 1 of this appendix. This meteorological data must be submitted to EPA on a monthly basis. (See Item 12, below.)
7. Kaiser must follow all monitoring and siting quality assurance criteria in 40 C.F.R. Part 58, Appendix E.
8. Kaiser must follow the operating procedures identified in 40 C.F.R. Part 58, Appendix A, the "Quality Assurance Handbook for Air Pollution Measurement Systems, Volume II: Ambient Air Quality Monitoring Program" (available at <https://www3.epa.gov/ttn/amtic/files/ambient/pm25/qa/QA-Handbook-Vol-II.pdf>), and any specified procedures in the manufacturer's maintenance manual for the units used to monitor TSP/Lead.
9. Kaiser is responsible for all maintenance associated with the TSP monitor. Maintenance must include, at minimum, the replacement and cleaning of any equipment on the schedule specified in the manufacturer's maintenance manual.
10. Kaiser must archive filters from the TSP instruments for a minimum of two years.
11. Kaiser must provide EPA and Ohio EPA personnel access to the site location and must respond to any inquiries regarding monitor siting, operations, or maintenance. In the event that an inspector or auditor identifies problems, Kaiser must take appropriate corrective actions. Any changes made to the monitor siting, operations, or maintenance must be approved by EPA prior to the change.
12. Kaiser must submit monthly reports to EPA no later than 14 days after the end of each calendar month, beginning the month following installation of the monitor and continuing for at least 12 months until all collected data have been reported. The reports must contain, at minimum, individual lead measurements for the most recent available month (including raw analytical data), a calculated monthly average, and a rolling 3-month average. Daily facility production data and meteorological data

should also be submitted for each report period. Kaiser must submit monthly reports to the following address:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Appendix D

Information You Are Required to Submit to EPA

Kaiser must submit the following information for its facility pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a), within 60 calendar days of its receipt of this letter.

1. Provide a spreadsheet (in Excel-compatible format) of all feed/charge materials used at the facility. For each feed/charge material include the name(s) of the supplier(s), the chemical composition of the charge, and the mass of feed/charge ordered and used per calendar month from January 1, 2012 through the date of receipt of this request.
2. Provide a spreadsheet (in Excel-compatible format) of all solid, liquid, and gaseous fluxes used at the facility, which includes the HCl/HF-producing chloride/fluoride content of each flux and the mass of flux ordered and used per calendar month from January 1, 2012 through the date of receipt of this request.
3. Provide the MSDS/SDS for each reactive flux used at the facility from January 1, 2012 through the date of receipt of this request.
4. Provide a spreadsheet (in Excel-compatible format) of the lead content and associated MSDS/SDS for each lead-containing alloy produced at the facility.
5. Provide a spreadsheet (in Excel-compatible format) of all alloys produced at the facility from January 1, 2012 through the date of receipt of this request. For each alloy, include the name and mass of all charges and fluxes used to create the alloy, the production rate, the chemical composition of the final alloy, and the mass of each alloy produced per calendar month, with a breakdown by furnace used for processing. For each alloy, calculate the total reactive chlorine and fluorine flux injection rates.
6. Provide a spreadsheet (in Excel-compatible format) of facility production logs from January 1, 2012 through the date of receipt of this request. Production logs should be broken down by furnace and should include, at minimum, the mass of each feed/charge and reactive flux used, the mass of each alloy produced, and associated operating parameters.
7. Provide manufacturers specifications for all melting furnaces at the facility. Specifications should include, at minimum, the dimensions and Btu rating of each furnace.
8. State whether each melting furnace at the facility is a Group 1 or Group 2 furnace, as defined in 40 C.F.R. §63.1503. Provide justification for your classifications.
9. Provide a spreadsheet (in Excel-compatible format) of monthly HCl emissions calculations, including a rolling 12-month average. Provide emissions calculations from January 1, 2012 through the date of receipt of this request. Include in your

response a narrative describing the method used for the emissions calculations, including the basis of any emissions factors or assumptions used and any documents outlining procedures for calculating emissions.

10. Provide a spreadsheet (in Excel-compatible format) of monthly lead emissions calculations, including a rolling 12-month average. Provide emissions calculations from January 1, 2012 through the date of receipt of this request. Include in your response a narrative describing the method used for the emissions calculations, including the basis of any emissions factors or assumptions used, and any documents outlining procedures for calculating emissions.
11. Provide a spreadsheet (in Excel-compatible format) of particulate matter (PM) emissions calculations from January 1, 2012 through the date of receipt of this request. Include in your response a narrative describing the method used for the emissions calculations, including the basis of any emissions factors or assumptions used, and any documents outlining procedures for calculating emissions.
12. Provide a diagram of the ventilation-and-control systems at the facility that control emissions and/or duct emissions to the atmosphere.
13. Provide copies of all documents related to any studies, inspections, or evaluations regarding ventilation conducted or attempted for any reason at the facility.
14. Provide a copy of the facility's scrap inspection program or site-specific scrap contaminant monitoring plan.
15. Provide copies of all emission reports submitted to OEPA or EPA since January 2012 and include:
 - a. A narrative describing the method used for annual emissions calculations for each pollutant, including the basis of any emissions factors used; and
 - b. Any documents outlining procedures for calculating annual emissions.
16. Provide copies of all deviation and compliance reports submitted to OEPA or EPA since January 2012.
17. Provide a table of all emission tests conducted at the facility for any reason, from January 2012 to the present, and provide copies of all emission test reports. If emission factor(s) or parametric monitoring limits used to demonstrate compliance within the past five years were generated from emission tests conducted prior to 2012, include copies of those test reports as well. Emission testing includes, but is not limited to, compliance testing, engineering testing, stack testing, capture efficiency testing, and testing for general information. Use the following guidelines for compiling the table and preparing copies of the test reports:

- a. Table: Identify the emissions units, the control device(s), the date of the test, the federal or state regulation requiring the test (if applicable), pollutants tested, type(s) and amount(s) of charge and flux used during the test, and the test method(s) used. For each test during which the source was not operating at maximum design capacity, provide an explanation for why production was limited. Indicate whether the report was shared with OEPA.
- b. Copies: Provide full stack test reports, including summary pages, the section describing the process parameters and production or processing rates at the time of the test, all test runs, and all calculations.

Appendix E

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Request to Provide Information Pursuant to the
Clean Air Act by Certified Mail, Return Receipt Requested, to:

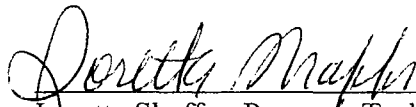
Anthony Klapac
Environmental Health and Safety Manager
Kaiser Aluminum Fabricated Products, LLC
600 Kaiser Drive
Heath, Ohio 43056

I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by e-mail to:

Bob Hodanbosi, Chief
Division of Air Pollution Control
bob.hodanbosi@epa.ohio.gov

Kelly Toth
Division of Air Pollution Control
Central District Office
kelly.toth@epa.ohio.gov

On the 14 day of June 2016.



Loretta Shaffer, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7011 1150 0000 2640 8268